EXHIBIT A

IN THE UNITED STATES DISTRICT COURT DISTRICT OF DELAWARE

ZAHRA MOWAFY, : NO: 05-733

Plaintiff,

NORAMCO OF DELAWARE, INC. and NORAMCO, INC.,

v.

Defendants.

AFFIDAVIT OF LARRY L. TURNER

I, Larry L. Turner, being first duly sworn under oath, state and depose as follows:

- 1. I am a partner with the law firm Morgan Lewis & Bockius.
- 2. I have represented the Defendants in their dispute with Plaintiff since May 2004.
 - 3. I am familiar with the litigation history of this matter.
- 4. My office received a copy of the Plaintiff's Default Motion by regular mail on Friday, March 17, 2006.
- 5. As of the filing of this response to the Plaintiff's Default Motion, I am not aware of my office or Noramco being served with a copy of the Plaintiff's Amended Complaint.

I understand that I am subject to punishment by law under 18 Pa. C.S. § 6.

4904 if the foregoing statements are willfully false.

Sworn to and subscribed before me this diday of

Lugust 2004. March POOG Notary Public

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal
Rosemary L. Lavin, Notary Public
City Of Philadelphia, Philadelphia County
My Commission Expires Aug. 23, 2008

Member, Pennsylvania Association Of Notaries